

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

BEVERLY L. WRIGHT, :
Plaintiff, :
v. :
JOHN E. POTTER, : **Civil No.: AMD-02-4181**
POSTMASTER GENERAL, :
UNITED STATES POSTAL SERVICE, :
Defendant. :
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CONSENT MOTION FOR EXTENSION OF TIME

Defendant, John E. Potter, Postmaster General of the United States Postal Service, by and through his attorneys, Thomas M. DiBiagio, United States Attorney for the District of Maryland, and John W. Sippel, Jr., Assistant United States Attorney for said District, files this Consent Motion for Extension of Time and for cause states:

1. This case arises out of Plaintiff's claims of employment discrimination while employed with the United States Postal Service. Plaintiff filed her Complaint on or about December 26, 2002.

2. The Defendant was served with a Summons and a copy of Plaintiff's Complaint on or about April 18, 2003. Agency counsel analyzed the claims contained in Plaintiff's Complaint and requires additional time to organize the agency's records and files to be submitted to undersigned counsel so that a response to Plaintiff's Complaint can be prepared and filed.

3. Due to the foregoing circumstances, Defendant requests additional time to file his response to Plaintiff's Complaint. Specifically, Defendant seeks an additional thirty (30) days in

which to file his response. If the Court grants this Request, then Defendant's response to Plaintiff's Complaint will be due on or before July 18, 2003.

4. Pursuant to Local Rule 105.9, Plaintiff's counsel consents to this extension of time.

WHEREFORE, Defendant prays for an Order extending the time through and including July 18, 2003 to file his response to Plaintiff's Complaint.

Respectfully submitted,

Thomas M. DiBiagio
United States Attorney

By: _____ /s/

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